

Nos. 21-15313, 21-15318

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**IN THE UNITED STATES COURT OF APPEALS  
FOR THE NINTH CIRCUIT**

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CITY AND COUNTY OF HONOLULU,  
*Plaintiffs-Appellees,*

v.

SUNOCO LP, *et al.*,  
*Defendants-Appellants.*

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COUNTY OF MAUI,  
*Plaintiff-Appellee,*

v.

CHEVRON USA INC., *et al.*,  
*Defendants-Appellants.*

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On Appeal from the United States District Court for the District of Hawai‘i,  
Case Nos. 1:20-cv-00163-DKW-RT, 1:20-cv-00470-DKW-KJM  
The Honorable Derrick K. Watson

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**CORPORATE DISCLOSURE STATEMENT OF APPELLANTS SHELL  
PLC, SHELL USA, INC., AND SHELL OIL PRODUCTS COMPANY LLC**

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March 15, 2022

*Counsel for Defendants-Appellants  
Shell plc (f/k/a Royal Dutch Shell plc),  
Shell USA, Inc. (f/k/a Shell Oil  
Company), and Shell Oil Products  
Company LLC*

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## **CORPORATE DISCLOSURE STATEMENT**

Pursuant to Rule 26.1 of the Federal Rules of Appellate Procedure, Defendants-Appellants Shell plc (f/k/a Royal Dutch Shell plc), Shell USA, Inc. (f/k/a Shell Oil Company), and Shell Oil Products Company LLC hereby make the following disclosures:

Shell plc is a publicly held company organized under the laws of the United Kingdom. Shell plc does not have any parent corporations, and no publicly traded company owns 10 percent or more of Shell plc's stock.

Shell USA, Inc. is a wholly owned subsidiary of Shell Petroleum Inc., whose ultimate corporate parent is Shell plc. No other publicly held company owns 10 percent or more of the stock of Shell USA, Inc.

Shell Oil Products Company LLC is a wholly owned subsidiary of Shell USA, Inc. No other publicly held company owns 10 percent or more of the stock of Shell Oil Products Company LLC.

This statement is filed solely for purposes of complying with Federal Rule of Appellate Procedure 26.1 and in order that the Judges of this Court may determine the need for recusal. This statement is not intended to operate as an admission of any factual or legal conclusion and is submitted subject to and without waiver of any defense, affirmative defense, or objection, including, but in no way limited to, venue, service, and personal jurisdiction.

Dated: March 15, 2022

Respectfully submitted,

/s/ David C. Frederick

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Products Company LLC*

### **CERTIFICATE OF SERVICE**

I hereby certify that, on March 15, 2022, I electronically filed the foregoing with the Clerk of the United States Court of Appeals for the Ninth Circuit by using the appellate CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the appellate CM/ECF system.

Dated: March 15, 2022

Respectfully submitted,

/s/ David C. Frederick

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